

CLINTON PAINTER
ANGLEMEYER vs NORTHAMPTON COUNTYAugust 27, 2020
1-4

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1	IN THE UNITED STATES DISTRICT COURT	1	I N D E X
2	FOR THE EASTERN DISTRICT OF PENNSYLVANIA	2	WITNESS EXAMINATION PAGE
3	ADA ANGLEMEYER, et al)	3	CLINTON C. PAINTER
4)	4	
5	- vs -) No. 19-3714	5	By: Mr. Zeiger 5, 83
6)	6	By: Mr. Bradford 73, 87
7	NORTHAMPTON COUNTY,)	7	
8	et al)	8	E X H I B I T S
9		9	NO. DESCRIPTION PAGE
10		10	Painter 1 Callout Report 25
11	Videotaped Video Teleconference	11	Painter 2 Concise History 60
12	Deposition of CLINTON C. PAINTER, held on August	12	Painter 3 Investigation Report 60
13	27, 2020, at 12:29 p.m., before Dolores M. Horne,	13	Painter 4 Intelligence Report 77
14	Professional Reporter and Notary Public, in and	14	
15	for the Commonwealth of Pennsylvania.	15	
16		16	
17		17	
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24		24	
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1	APPEARANCES:	1	DEPOSITION SUPPORT INDEX
2		2	
3	THE ZEIGER FIRM	3	Direction to Witness Not to Answer
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12		12	
13	PENNSYLVANIA OFFICE OF ATTORNEY GENERAL	13	Stipulations
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22	ALSO PRESENT:	22	
23	JASON PELOTTE	23	
24		24	

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1 THE VIDEO TECHNICIAN: We are now 2 on the record. The time is now 12:29 p.m. on 3 August 27, 2020. This begins the video conference 4 deposition of Clinton C. Painter taken in the 5 matter of Ada Anglemeyer, et al, versus 6 Northampton County, et al, filed in the US 7 District Court, Eastern District of Pennsylvania, 8 Civil Action No. 19-3714. My name is George 9 Ellis. I'm the remote videographer today. The 10 court reporter is Dolores Horne. We are 11 representing Esquire Deposition Solutions. 12 Counsel, will you please state 13 your name and who you represent after which the 14 court reporter will swear in the witness. 15 MR. ZEIGER: Brian Zeiger for the 16 plaintiffs. 17 MR. BRADFORD: Kevin Bradford for 18 all of the defendants currently in the case. 19 CLINTON C. PAINTER, after having 20 been first duly sworn, was examined and testified 21 as follows: 22 * * * 23 EXAMINATION 24 * * *	Page 5 1 Q. And at 4:00 a.m. were you briefed on the 2 operation or what would happen at 6:00 a.m.? 3 A. Yes. 4 Q. And did your tour of duty then take you 5 to 340 Old Allentown Road at Bushkill Township, 6 Northampton, Pennsylvania? 7 A. Yes, I believe that was the address. 8 Q. And in that tour you were as part of a 9 SERT team? 10 A. Yes, I was. 11 Q. And that was to execute a warrant on 12 that property? 13 A. Yes. 14 Q. And did you use force once you entered 15 the property? 16 A. Yes. 17 Q. And was the person you used the force 18 against male or female? 19 A. Female. 20 Q. And do you know that person's name? 21 A. I learned it after the fact. 22 Q. What is her name? 23 A. I believe Ada. 24 Q. Okay. And her last name is Anglemeyer;
1 BY MR. ZEIGER: 2 Q. Good morning, Trooper. 3 A. Good morning. 4 Q. Trooper, do you recall February 23, 5 2018? 6 A. Yes. 7 Q. And were you employed as a Pennsylvania 8 State Trooper on that day? 9 A. Yes, I was. 10 Q. And do you remember being at a briefing 11 session at approximately 04:00 hours on that 12 day? 13 A. Yes. 14 Q. And was that at the Belfast State 15 Trooper barracks in Pennsylvania? 16 A. Yes. 17 Q. And after that briefing were you part of 18 a SERT team at approximately 6:00 a.m. in the 19 morning? 20 A. Yes, I am part of the team. 21 Q. At approximately 6:00 a.m. did you -- 22 did you go to a property as part of that SERT 23 team? 24 A. Yes.	Page 6 1 is that right? 2 A. Yes. 3 Q. Okay. And do you know if based on the 4 force you used if Ada Anglemeyer was injured? 5 A. Yes. 6 Q. Is that a yes, that you know she was 7 injured or, yes, that she was, in fact, injured or 8 both? 9 MR. BRADFORD: Objection to the 10 form. You can answer. 11 THE WITNESS: Yes, I knew she was 12 injured. 13 BY MR. ZEIGER: 14 Q. And if you know, was she injured as a 15 result of the force that you used? 16 A. I believe so. I can't say for certain 17 because there was also related that she had a 18 previous back surgery or injury. 19 Q. I get that -- 20 A. So I don't know. 21 Q. Sir, please finish your answer. It's 22 very hard with this audio. It is not my intention 23 to cut you off in any way. I apologize at the 24 outset for that.

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1 A. Okay.		1 A. Yes.
2 Q. Please finish answering the question?		2 Q. I'm going to pull up a document on my
3 A. Yes, I believe I injured her, yes.		3 screen here, and then I'm going to attempt to
4 Q. Okay. And do you accept responsibility		4 share it with you. I'm going to zoom in for you.
5 then for causing that injury?		5 Can you see that?
6 MR. BRADFORD: Objection to the		6 A. Yes, I can.
7 form. Go ahead and answer that, I guess.		7 Q. Can you tell me what this document is?
8 THE WITNESS: Can you repeat the		8 A. That's one of my callout reports that I
9 answer -- I mean the question, please?		9 completed for this call for that warrant detail.
10 BY MR. ZEIGER:		10 Q. Okay. And is that your name where it
11 Q. Do you accept responsibility for causing		11 says name?
12 her injury?		12 A. Yes.
13 MR. BRADFORD: I object. You can		13 Q. And it says date of activation, 2-23-18.
14 answer.		14 Was that the date of the incident?
15 THE WITNESS: Yes.		15 A. To the best of my knowledge.
16 BY MR. ZEIGER:		16 Q. And it says date of report, 2-27-18?
17 Q. Have you apologized to her?		17 A. Yes.
18 MR. BRADFORD: Objection.		18 Q. Is that the day that you wrote the
19 THE WITNESS: No.		19 report?
20 BY MR. ZEIGER:		20 A. Yes, it is.
21 Q. Would you like to apologize to her right		21 Q. Okay. And I'm not asking you a question
22 now on the record?		22 now. I don't want you to tell me any
23 MR. BRADFORD: No. Don't answer		23 communication you had with your attorney. Okay.
24 that question. That's an improper question. Go		24 I'm just asking you in a more general sense. Did
Page 10		Page 12
1 ahead, Brian. Move on.		1 you review this document today before your
2 MR. ZEIGER: Well, I mean, it's		2 deposition?
3 the same thing we had in the last deposition. If		3 A. Not today, yesterday.
4 it's a car accident, you're allowed to say it's my		4 Q. Okay. And did you note any mistakes
5 fault. I'm sorry you're hurt. If that's the case		5 or omissions on the document in your review?
6 and he accepts responsibility, which I think --		6 A. No.
7 MR. BRADFORD: Wait --		7 Q. And who is the typist?
8 MR. ZEIGER: He's allowed to say		8 A. I typed it.
9 I hurt you, I'm sorry. He can say it. What is		9 Q. And did any supervisor review it?
10 the basis of the objection?		10 A. I submitted it to our coordinator and
11 MR. BRADFORD: It's an improper		11 then it gets reviewed and filed.
12 question --		12 Q. Were any changes made to the document
13 MR. ZEIGER: It's not --		13 from when you originally typed it and submitted it
14 MR. BRADFORD: I'm instructing		14 until it was accepted?
15 him not to answer that. You can go ahead and file		15 A. Not to my knowledge.
16 a motion with the judge saying, you know, you want		16 Q. Okay. So, to the best of your
17 him to answer that question.		17 knowledge, the document that you reviewed
18 MR. ZEIGER: Okay. If he wants		18 yesterday in preparation for today's dep is the
19 to say he's sorry, he has an opportunity, though.		19 same document that you originally typed and
20 MR. BRADFORD: Yeah, well, this		20 submitted?
21 isn't the context for that, anyway. Go ahead.		21 A. Yes.
22 BY MR. ZEIGER:		22 Q. Okay. Very good. I'm going to go down
23 Q. Trooper, did you have an opportunity to		23 here. First it says straight time hours used,
24 fill out any paperwork in regard to this case?		24 eight hours and overtime hours used nine hours.

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Page 13 1 It means you used 17 hours on this job? 2 A. Yes. 3 Q. I'm scrolling. Let's -- let's go 4 through this document here. It says on February 5 21st of 2018 at approximately 19:30 hours I was 6 requested to assist the East Team on a warrant 7 service at the above location. So what -- that 8 means that's the day that you were notified you 9 were going to be on this SERT team to execute this 10 warrant? 11 A. Yes. 12 Q. And then on 2-23-18 at 04:00 hours you 13 responded to assembly point and received a 14 briefing regarding the warrant service. That 15 means you met up with all the other troopers and 16 you were told by a supervisor of what this was 17 about; is that correct? 18 A. Yes. 19 Q. And the briefing revealed the following 20 regarding this warrant service. There was an 21 ongoing investigation in the distribution of 22 methamphetamine, three structures. Main residence 23 is a large structure containing multiple 24 occupants, adults. The majority of adult	Page 15 1 methamphetamine operation was going on on this 2 parcel of land? 3 A. Yes. I believe it was through the 4 garage. 5 Q. Okay. And the garage is the name of one 6 of the three structures, correct? 7 A. Yes. 8 Q. The garage is not the main residence, 9 correct? 10 A. Correct. 11 Q. And you had no information that there 12 was any methamphetamine activity going on in the 13 main residence, correct? 14 A. Correct. 15 Q. Now, you mentioned something about 16 having a firearm here, right, people had 17 firearms? 18 A. Yes. 19 Q. You're not -- you didn't write here that 20 anyone had an illegal firearm; did you? 21 A. No. 22 Q. There's nothing illegal per se about 23 having a firearm in your own home; is there? 24 A. No.
Page 14 1 occupants have been seen, known to open carry 2 firearms throughout the residence. Multiple 3 firearms known to be inside of the residence and 4 the owner, occupants are known to be anti police 5 from previous encounters with local police. Is 6 that what you wrote? 7 A. Yes. 8 Q. Okay. Were you made aware of who the 9 target of the methamphetamine investigation was? 10 A. That was during the briefing, yes. 11 Q. Who was that? 12 A. I don't know. I don't have his name off 13 the top of my head but it -- I believe it was a 14 son that lived there. 15 Q. If I said the name Mark Anglemeyer, 16 would that refresh your recollection? 17 A. I know that the last name was 18 Anglemeyer. I don't know the first name. 19 Q. Were you given any information on where 20 -- let's back up for a minute. Were you made 21 aware that this parcel of land had -- had multiple 22 properties on it? 23 A. Yes. 24 Q. And were you made aware of where the	Page 16 1 Q. Were you aware of -- that some of the 2 people had a valid Pennsylvania license to carry 3 concealed? 4 A. Yes. 5 Q. And you're aware as a state trooper that 6 you can't get a conceal carry permit if you have a 7 criminal history, right? 8 A. Correct. 9 Q. And, so, you weren't aware -- and you 10 also have to give your name and information when 11 you purchase a firearm, correct? 12 A. Yes. 13 Q. So, you were not aware when you went in 14 there of any illegal firearms, right, that wasn't 15 part of your mission; was it? 16 A. No. 17 Q. If you were told that there were people 18 in there that had a valid license to carry and 19 that had validly registered the firearms, then 20 that's no crime, right? 21 A. Correct. 22 Q. And based on reason and logic, you could 23 then conclude that they were not criminals because 24 they would not have been able to have a license to

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Page 17 1 carry, correct? 2 MR. BRADFORD: Objection to form. 3 THE WITNESS: Correct. 4 BY MR. ZEIGER: 5 Q. Okay. So, let's move on. You were 6 assigned to the East Tac van. What does that 7 mean? 8 A. It's one of the vehicles that we use to 9 drive there. 10 Q. Who else was in your van? 11 A. It's listed on the worksheet who was in 12 the van. 13 Q. So you don't remember? 14 A. Not off the top of my head, no. 15 Q. Where were you seated in the van? 16 A. In the back of it. 17 Q. Next it says, my assignment was point 18 ground level making entry into, quote, four, quote 19 side entrance of the residence. I was equipped 20 with a shield and a Glock 21. What does four 21 mean? 22 A. That's how you number the residences, 23 the sides of the houses. So if you stare at it 24 straight on, that would be the one side working --	Page 19 1 flush with the shield or does it stick out from 2 the shield? 3 A. It protrudes a little bit. 4 Q. And then you say 2 inches? 5 A. Approximately, yes. 6 Q. And then there's that glass part. 7 That's there so you can see through the shield, 8 correct? 9 A. Correct. 10 Q. Because the rest of the shield is black, 11 right? 12 A. Yes. 13 Q. And that little window, does that 14 protrude out of the shield or is that flush as 15 well? 16 A. It protrudes out a little bit, not as 17 much as the flashlight, though. 18 Q. Say an inch? 19 A. Yes. 20 Q. And the piece that protrudes, is that 21 plastic or metal? 22 A. That's -- that's plastic. 23 Q. Okay. Moving on. Upon entry into the 24 primary entry point, I proceeded into the dining
Page 18 1 working around clockwise, two, three, four side. 2 Q. And it says shield, can you describe the 3 shield? 4 A. It's a ballistic level three shield. 5 Q. Can you describe what it looked like? 6 A. It's rectangular in shape. It has a 7 window port with two glass lights in front of it. 8 I don't know if they're glass. But it has two -- 9 two flashlights available on the front of it. 10 Q. Are the flashlights covered with 11 anything? 12 A. I think, yeah, there's like a metal 13 guard around them. 14 Q. Is it like a gate? 15 A. Yes, I guess you could say that. 16 Q. What material is it made of? 17 A. The what? 18 Q. The gate. 19 A. I don't know. 20 Q. Do you think it's metal or plastic -- 21 A. I think it's metal, sort of protects it 22 for -- metal or aluminum so it doesn't -- the 23 glass or flashlights, so it don't get broken. 24 Q. And do -- does that part -- is that part	Page 20 1 room. Upon entry I observed two open doorways 2 into the adjacent room. So, the entry point was 3 that the kitchen? 4 A. I don't know. 5 Q. You don't remember or you don't know? 6 A. I don't remember what it was. I think 7 -- I remember seeing like a table there, so that's 8 why I think I called it the dining room. 9 Q. Okay. So, the -- so the dining room, 10 was that the first room you went in? 11 A. Yes. 12 Q. The next sentence says upon entry I 13 observed two open doorways into an adjacent room. 14 Does that -- that means there's two other rooms 15 connected to that dining room? 16 A. Yes. 17 Q. Were you part of something called a 18 train? 19 A. That's a terminology. 20 Q. Were you part of that? 21 A. Yes. 22 Q. Who else was in your train? 23 A. I don't know off the top of my head. 24 Q. Okay. The next sentence, while clearing

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Page 21 1 I observed one WNM enter the doorway to the right. 2 Okay. So what -- what does that mean while 3 clearing? 4 A. As I was going, I observed one -- one 5 person standing in the doorway to the right. 6 Q. I know. What does the word clearing 7 mean? What does that mean? 8 A. Clearing -- clearing the rooms looking 9 for people. 10 Q. Okay. What does WNM mean? 11 A. White non Hispanic male. 12 Q. And how old was that person? 13 A. I don't know. 14 Q. Did he look like a senior citizen, a 15 teenager, middle aged person? 16 A. Adult male -- 17 Q. I didn't understand your answer. I'm 18 sorry. I just can't hear you. 19 A. I know. Sorry. Another phone call came 20 through. It was an adult male. 21 Q. Did it not look like a senior citizen? 22 A. No. I couldn't tell. 23 Q. No or you couldn't tell? It's kind of a 24 different answer.	1 him? 2 A. No. 3 Q. The next sentence says, I proceeded to 4 the left half of the room and cleared to the open 5 doorway to the left. Is that the opposite 6 direction from where -- where that male was going 7 or the same direction as to where that male was 8 going? 9 A. The same direction. 10 Q. I observed the male through the doorway 11 deep into the room. Same guy? 12 A. Yes. 13 Q. And he stayed in that other room? 14 A. Yes. 15 Q. Did you see any weapons or firearms on 16 his person? 17 A. No. 18 Q. Did you see any weapons or firearms 19 anywhere near him in either of the two rooms? 20 A. No. 21 Q. Were you given a picture of Mark 22 Anglemeyer before you went into the house? 23 A. Yes. 24 Q. And that's the person that was the
Page 22 1 A. I could not tell. 2 Q. Okay. The next line says, the male was 3 given verbal commands being state police search 4 warrant. Did you give the commands or did 5 somebody else? 6 A. I do. We all give commands but I was 7 giving commands. 8 Q. The next sentence, the male was also 9 given multiple commands to get on the ground and 10 show us his hands. Who gave the commands? 11 A. I did initially at first. And then I 12 broke to my next primary sector within the 13 house. 14 Q. The next sentence says, the male refused 15 all commands, stood there for a short period of 16 time and then retreated into the adjacent room out 17 of sight. What -- what room did he go in? 18 A. The room he was standing in when he was 19 in the doorway. 20 Q. Do you know what was in that room? 21 A. No. 22 Q. Did you follow him? 23 A. No. 24 Q. Did you see another trooper follow	Page 24 1 subject of the methamphetamine operation in the 2 garage, correct? 3 A. For Mark, yes. 4 Q. Right. And the person that you saw in 5 this first room and then the second room, that was 6 not Mark, correct? 7 A. Yes, correct. 8 Q. And the person you saw had not been 9 identified by you or any other trooper as being a 10 dangerous person, correct? 11 A. I didn't know who it was. 12 Q. Well, you knew it wasn't Mark, right? 13 A. Correct. 14 Q. And Mark was the only person identified 15 in your briefing as being a dangerous person, 16 right? 17 MR. BRADFORD: Objection to form. 18 THE WITNESS: Correct. 19 BY MR. ZEIGER: 20 Q. I'm sorry. Your answer was correct; 21 yes? 22 A. Yes. 23 Q. Okay. More commands were given, which 24 he refused all. The next sentence, as I was

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Page 25 1 proceeding into the room another a WNM appeared in 2 the doorway with no shirt on. That male, was he a 3 senior citizen? 4 A. No -- I don't know what he was. 5 MR. ZEIGER: Pardon me. I have to 6 take this. 7 THE VIDEO TECHNICIAN: Off the 8 record. The time is 12:51. 9 (Whereupon a break was taken.) 10 THE VIDEO TECHNICIAN: We are 11 back on the record. The time is 12:55. 12 BY MR. ZEIGER: 13 Q. Trooper, so sorry about that. Let me 14 share my screen again. Just for the record, I'm 15 going to have this document marked as Painter 1. 16 Okay. As -- as I was proceeding into the room, 17 another WNM appeared in the doorway with no shirt 18 on. And I asked you if that person was a senior 19 citizen. 20 A. I couldn't tell. 21 Q. Okay. Could you tell at all how old the 22 person was? 23 A. No. 24 Q. Did the person seem confused or	1 approximately how old the male is? 2 A. No. I'm at -- like that wasn't my point 3 of responsibility where it was. So I'm kind of 4 looking further ahead when that happened. 5 Q. Did you later learn that person's 6 name? 7 A. No. 8 Q. Entry was made into the room. The first 9 WNM that was observed standing in the center of 10 the room. Verbal commands were given to him, 11 which he refused all commands and became verbally 12 aggressive by yelling. I held on the said male 13 giving him verbal commands to get on the ground. 14 What does I held on the said male mean? 15 Pardon me, Trooper. I'm so sorry. What does that 16 mean? 17 A. I held, which means I stayed in the same 18 location I was at, not moving and gave him verbal 19 commands. 20 Q. The WNM continued to resist and refused 21 all commands. The said WNM was then pinned 22 against the wall -- pardon me again. 23 THE VIDEO TECHNICIAN: Off the 24 record.
Page 26 1 disoriented? 2 A. No. I think he was following commands. 3 He was -- he was crawling out on the floor and 4 then that was really my little interaction with 5 him and another member dealt with him. 6 Q. The next sentence says, that said male 7 had to be pushed to the ground in the doorway due 8 to his close proximity and also refusing commands 9 to show us his hands and to get on the ground. 10 Who pushed him to the ground? 11 A. I did. He was coming out partially and 12 he was in close proximity and I just pushed him 13 down. 14 Q. And what did you push him with? 15 A. My shield. 16 Q. And what part of your shield touched 17 what part of his body? 18 A. I believe it was the lower half of my 19 shield because he was -- like he came out of 20 nowhere. 21 Q. And what -- what part of his body did it 22 touch? 23 A. I think his backside. 24 Q. And at that point are you able to tell	Page 28 1 (Whereupon a break was taken.) 2 THE VIDEO TECHNICIAN: Back on 3 the record. 4 BY MR. ZEIGER: 5 Q. The said WNM was then pinned against the 6 wall with a shield by another member to contain or 7 limit his movement and to detain, control him. 8 Who was that other member? 9 A. I believe that was Corporal McGarvey. 10 Q. I then proceeded to clear through the 11 rest of the residence and came to a hallway. At 12 the end of the hallway I observed it went to an 13 open bedroom. As I proceeded through the hallway, 14 verbal commands were being given indicating state 15 police search warrant. Now, Trooper, throughout 16 that time did you observe any illegality? 17 A. Any what? 18 Q. Anything illegal? 19 A. No. It's not my job to search for stuff 20 that is illegal. 21 Q. I understand. But you're a member of 22 law enforcement. Did you see any narcotics 23 anywhere? 24 A. No.

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1 Q. Did you see anyone with a firearm?		1 have -- I don't know if it was -- I don't want to	
2 A. No.		2 say it was an aggressive manner, because that's --	
3 Q. Did you see any firearms or ammunition		3 that's not what it was, that I -- I picked up as.	
4 or any other thing related to firearms as you were		4 I didn't know if it was in a passive manner. I	
5 walking through the house?		5 didn't know. I knew she was yelling something.	
6 A. No. It was darker.		6 Q. Based on your experience, did she seem	
7 Q. What was the last --		7 to be confused?	
8 A. It was dark. The lighting was dim. It		8 A. I didn't -- that didn't cross my mind.	
9 was dark.		9 I couldn't tell.	
10 Q. I understand. As I was proceeding		10 Q. I slowed my approach towards her telling	
11 through the hallway, verbal commands were being		11 her to get on the ground, show her hands. The	
12 given indicating state police search warrant.		12 white non Hispanic female did not follow any of	
13 As I proceeded down the hallway, I observed a WNF		13 the verbal commands and did not make any type of	
14 enter the doorway hallway. What does WNF stand		14 action or movement to show me her hands or to	
15 for?		15 comply in any manner. So she just stood there?	
16 A. White non Hispanic female.		16 A. Yes.	
17 Q. And later did you learn the identity of		17 Q. Did you see her with a firearm?	
18 that WNF?		18 A. No.	
19 A. Yes. That's Ada.		19 Q. Did she aggress towards you?	
20 Q. Okay. I gave the female verbal commands		20 A. No.	
21 indicating state police search warrant. Get on		21 Q. Did she try to push you or anything of	
22 the ground. Do you -- did she comply?		22 that nature?	
23 A. No.		23 A. No, no.	
24 Q. Can you estimate about how old she is?		24 Q. Did she try to run?	
	Page 30		Page 32
1 A. I couldn't.		1 A. No.	
2 Q. Would you say she's a senior citizen?		2 Q. This was very -- a very short amount of	
3 A. At the time I couldn't -- I couldn't		3 time, right, that this all took place, probably	
4 tell. It was -- it was dark out. I was using my		4 less than ten seconds?	
5 shield lights. And throughout the whole process		5 A. Correct.	
6 of all this, like it's easy to break down here,		6 Q. And you did not observe her do anything	
7 but all this is going on in a matter of like less		7 illegal, correct?	
8 than a minute. The whole house was cleared in		8 A. Correct.	
9 probably less than a minute. So it's -- it's easy		9 Q. And she was the only person standing	
10 to break down and question did I see anything --		10 there, correct?	
11 for people -- and for bad people. I cleared		11 A. That I could see, correct.	
12 through. And when I got to her, I -- I couldn't		12 Q. And she was not the subject of any kind	
13 tell how old she was. The whole hallway was dark.		13 of investigation of which you were there for,	
14 I'm looking through a shield port and both of my		14 correct?	
15 hands were -- were occupied.		15 A. She wasn't identified -- I didn't know	
16 Q. So, you couldn't tell how old she was?		16 who she was.	
17 A. No.		17 Q. You didn't see her try to flee or run	
18 Q. I gave the female verbal commands,		18 away from you; did you?	
19 indicated state police search warrant, get on the		19 A. No.	
20 ground. The female was yelling at my direction.		20 Q. You weren't thinking she was going to be	
21 However, it was unknown what was being said. So,		21 arrested for anything; did you?	
22 today thinking back, more time has passed, do you		22 A. I didn't know who she was or what part	
23 have any idea what she was saying?		23 of the investigation she was -- she was involved	
24 A. No. I would have put it in there. I		24 in.	

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1 Q. So, at that time the answer is no? 2 A. She was an actor within the residence 3 that we were asked to search. 4 Q. I understand. But at that time you had 5 no knowledge that she was about to be arrested for 6 anything, right? 7 A. I -- yes, correct, I didn't know she was 8 going to be arrested or if she was part of it or 9 not. 10 Q. Let's -- let's just go down the list. 11 She wasn't Mark Anglemeyer, obviously, because 12 she's female, right? 13 A. Right. 14 Q. And in your briefing session there was 15 no information about someone named Ada Anglemeyer 16 that was going to be suspected or arrested of any 17 crime, correct? 18 A. Correct. 19 Q. And in your interaction with her, you 20 didn't observe her violate any laws of the 21 Commonwealth of Pennsylvania; did you? 22 A. No. 23 Q. So, to your knowledge, in your mind at 24 that time she was not about to be under arrest for	1 was not trying to resist you actively; was she? 2 A. Actively no -- actively I don't know. 3 Q. Let's go back to the document. I 4 continued towards her in slow manner to close 5 proximity and pushed her with my shield to clear 6 the doorway of the room due to the rest of the 7 residence not being secured. So, when you pushed 8 her with your -- with your shield, what part of 9 the shield touched what part of her body? 10 A. I cannot answer that question because I 11 don't have -- I intended it to be a chest level 12 just to push her back into the room. What was 13 actually struck or impacted, I don't know. 14 Q. Now, let me ask this whole question 15 before you answer. So, when you pushed her with 16 the shield, did you hold the shield towards your 17 body and then push into her or were you standing 18 upright and pushed the shield out a popping motion 19 away from your body to hit her with the shield? 20 A. She was in close proximity to the shield 21 and I pushed outwards with my arm. 22 Q. So, more of like that popping answer, so 23 the shield moved away from your body but your body 24 stood still as you pushed her with the shield?
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1 anything; was she? 2 A. My -- that's difficult to answer because 3 I'm asked to serve these high risk propensity of 4 violence search warrants on people and people that 5 are within the houses. My job isn't to do the 6 investigation and it's not to followup on 7 investigations, to search after and to do charges 8 after. It's to secure the residence of people and 9 potentially bad people that could be in it. So 10 I -- I can't answer that question myself because 11 I've done no type of investigations into the 12 residence or -- or what was even going to be found 13 or anything within the house. 14 Q. I understand. But my job, what I do for 15 work is -- requires me to show different like 16 factors that go into law enforcement members when 17 they're doing their job. Okay. So, one of the 18 factors that I'm discussing with you right now is 19 whether the suspect was about to be arrested for 20 something. 21 A. Okay. At that point in time I had no 22 probable cause to arrest her for nothing, just 23 based on me. 24 Q. That's all I was getting at. And she	1 A. I wouldn't call it popping. The 2 shield -- the shield was touching her and I just 3 pushed it outwards. 4 Q. Okay. But your body stayed still except 5 for your arms? 6 A. No. I was walking forward. 7 Q. Okay. So, were your elbows locked when 8 you pushed her with the shield? 9 A. Initially. 10 Q. And then as you pushed her, your elbows 11 unlocked? 12 A. My left elbow. 13 Q. Okay. From the said push she fell 14 backwards into the room. Did you see her hit the 15 ground? 16 A. Yes. 17 Q. And what part of her body touched what 18 part of the -- did she fall onto the floor? 19 A. Yes. That's all I could answer. She 20 fell backwards onto the floor. 21 Q. Did you see what part of her body hit 22 the floor? 23 A. I don't know if it was her back or her 24 buttocks or she just went -- she fell backwards.

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<p>1 Q. I continued into the room and cleared 2 it. What -- what does that mean?</p> <p>3 A. So, to back up. The reason for the push 4 was for her standing in the doorway and I was -- I 5 was limited of what I could do in that area in 6 terms of complete clearing the rest of the 7 residents in the house. So I pushed her into the 8 room in -- in order to clear the bedroom and the 9 rest of the house for other actors. So you asked 10 me what -- what clearing means, which means 11 clearing the corners, clearing around the bed and 12 moving on to the next doorways or any other places 13 where people could be.</p> <p>14 Q. You said you cleared that room, so there 15 was nothing -- nothing else going on in that room?</p> <p>16 A. So, I cleared the room, which means a 17 room entry of how we do it. I broke right, 18 cleared the right corner and the far adjacent 19 corner while other members come in and -- and 20 held on her and finished the other clearing of 21 the other side of the room.</p> <p>22 Q. Did you find anything else in -- anyone 23 else in the room, any other human beings?</p> <p>24 A. No.</p>	<p>1 conducted, it deemed the residence to be secured. 2 What does that mean, secondary search?</p> <p>3 A. That's more of a -- like as I explained 4 earlier, like how -- like the movement and the 5 speed of how some of these go, the first initial 6 primary is more of a faster pace. The secondary 7 is more of a -- like hiding places or anywhere 8 people could hide or anything like that. So it's 9 kind of more of a detailed search looking for 10 people that could be hiding or whatnot.</p> <p>11 Q. Did your secondary --</p> <p>12 A. I'm sorry.</p> <p>13 Q. Did your secondary search reveal 14 anything in this case?</p> <p>15 A. No.</p> <p>16 Q. I then went back to the WNF and she was 17 complaining of back pain. So, is that the same 18 person, Ada Anglemeyer?</p> <p>19 A. Yes.</p> <p>20 Q. And was she seated, standing, on the 21 ground? Where -- where was she when you went back 22 to her?</p> <p>23 A. She was in -- at the same location on 24 the floor.</p>
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<p>1 Q. Did you find anything of interest in the 2 room related to your investigation or your 3 execution of the warrant in the room?</p> <p>4 A. I was searching for people.</p> <p>5 Q. Understood. But, I mean, you're a 6 member of law enforcement. I understand what your 7 mission was. But you didn't observe in plain view 8 any kind of methamphetamine operation?</p> <p>9 A. No.</p> <p>10 Q. The female was secured and covered by 11 another member. What does that mean?</p> <p>12 A. Another member stayed with her while we 13 finished clearing the rest of the house.</p> <p>14 Q. Was she handcuffed or zip tied?</p> <p>15 A. I don't believe so. I don't know. I 16 don't think she was.</p> <p>17 Q. I proceeded and cleared the rest of the 18 residence, which was approximately four other 19 rooms and the indoor pool area. Did you come in 20 contact with -- with anyone else in those four 21 rooms or the -- in the pool area?</p> <p>22 A. No.</p> <p>23 Q. Once the primary clearance of the 24 residence was conducted and secondary search were</p>	<p>1 Q. Was she sitting up or just laying on the 2 ground?</p> <p>3 A. I don't know. Like I don't remember.</p> <p>4 Q. The female was yelling out loud that she 5 just had back surgery. Did she say anything else?</p> <p>6 A. Not that I recall.</p> <p>7 Q. Medics were contacted for the female at 8 the -- as the residence was deemed secure. The 9 medics treated the female, and she was later 10 transported to the hospital. Did you go with her 11 to the hospital?</p> <p>12 A. No.</p> <p>13 Q. Did any troopers go with her to the 14 hospital?</p> <p>15 A. I don't know.</p> <p>16 Q. Was she ever charged with any crimes 17 related to this incident?</p> <p>18 A. I don't know.</p> <p>19 Q. Did you ever recommend any charges be 20 brought against her to any other members of law 21 enforcement in this matter?</p> <p>22 A. No.</p> <p>23 Q. Did you ever speak with the supervisor 24 about charging her with anything?</p>

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1 A. No. 2 Q. Sitting here today, do you believe she 3 should have been charged with anything? 4 A. No. 5 Q. Next I did not observe anything within 6 the residence of evidentiary value. Does that 7 mean you didn't find any evidence of any kind of 8 methamphetamine operation? 9 A. That was in plain view of just what I -- 10 what I saw or encountered. 11 Q. Okay. So, in other words, that sentence 12 is just about any kind of illegality, it's not 13 about methamphetamine, correct? 14 A. Correct. 15 Q. I was released from the scene by the 16 command post Topcom. What does that mean? 17 A. After we serve the warrant, once it's 18 turned over to investigators and they don't need 19 anything else from us, we leave. We debrief it 20 and we get released. 21 Q. Okay. 22 A. The command post would be our 23 coordinator. The Topcom would be whatever station 24 or state police, whoever was designated. I don't	Page 41	1 administratively to -- to the briefing. 2 Q. But it had -- it arrived at the property 3 at some point in time, correct? 4 A. Yes. It's -- it's on the assignment 5 of -- on the documents, whoever was assigned to 6 drive it. I don't know who drove it to the 7 property. 8 Q. And was it used on -- on this day at all 9 for any purpose? 10 A. I believe so, yes. 11 Q. What was it -- what was it used for, if 12 you know? 13 A. I don't know. 14 Q. I'm going to un-share this. There's a 15 word that was used in a previous deposition called 16 compromise. And I believe it's used meaning like 17 the people you're serving the warrant on may know 18 that you're coming, like the element of surprise 19 is gone. 20 A. Correct. 21 Q. Are you aware with this warrant, was 22 this scene compromised before you entered? 23 A. There was intel path from pre-deployment 24 that it could have been due to a vehicle leaving	Page 43
1 know who it was at the time but it's documented on 2 the reports. 3 Q. Okay. Next it says, post activation 4 inventory completed. Weapon and equipment 5 maintenance completed. What does that mean? 6 A. Just basic inventory and make sure we 7 had everything we came there with and everything 8 was just taken care of. That's like an 9 administrative thing we do. 10 Q. Okay. I assisted with transporting the 11 Bearcat to and from the assembly point with 12 Trooper Walters and Corporal and Trooper Bigelow. 13 What is a Bearcat? 14 A. That's our armored vehicle that is 15 utilized for -- for these warrants. 16 Q. Where was the Bearcat? 17 A. Before I transported it or -- or at the 18 house? 19 Q. Let's start -- let's start at 6:00 a.m. 20 or just before 6:00 a.m. when you arrive at the 21 property, how -- how does the Bear -- does the 22 Bearcat get to the property? 23 A. One of the negotiators drives it. 24 That's administrative -- we transport it	Page 42	1 and seeing us drive by. 2 Q. Do you have any firsthand knowledge 3 yourself of a compromise of the scene? 4 A. That's all I know of it because I sit in 5 the back of the van -- 6 Q. I get that. But my question is much 7 more simplistic, I think, than perhaps what you 8 think it means. I mean like when you -- when 9 you're in the van, do you see out the window 10 anything that looks like a compromise to you? 11 A. No, I didn't see anything. 12 Q. When you get to the scene and you get 13 out of the van, do you observe anything with your 14 own eyes that looks like there's a compromise to 15 you? 16 A. No. 17 Q. So, you didn't have any firsthand 18 knowledge of any kind of compromise, right? 19 A. No. It's not my position, though, as 20 well. But firsthand knowledge, no. 21 Q. I understand. I think that you think I 22 mean it in like a technical way, compromise. I 23 just mean it in a very human way. Like did -- 24 whether it's your position or not, did you observe	Page 44

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<p style="text-align: right;">Page 45</p> <p>1 anyone like run in the house and close the door 2 behind them when they saw you? You didn't see 3 anything like that; did you? 4 A. No. 5 Q. All right. I'm going to go to another 6 document -- well, actually I'm not for a second. 7 So, Trooper, how many years have you been a 8 trooper? 9 A. A little over eight years. 10 Q. And before that did you have any jobs in 11 the military, security or law enforcement? 12 A. I was local law enforcement and I was in 13 the military before that. 14 Q. What local law enforcement were you part 15 of? 16 A. Washington Township. 17 Q. What county? 18 A. Westmoreland County. 19 Q. And is that the only law enforcement job 20 you had? 21 A. No. I had a few other part-time police 22 jobs before I got with the state. 23 Q. Okay. And in the military, what branch 24 of the military were you in?</p>	<p style="text-align: right;">Page 47</p> <p>1 Q. Do you have any duty to report on 2 another trooper if you see another trooper do 3 something wrong? 4 A. Yes. 5 Q. What is that duty? 6 A. If it's a violation of what, of use of 7 force? 8 Q. Pardon me for one second. I'm sorry. 9 Can we take a very brief recess. 10 THE VIDEO TECHNICIAN: Off the 11 record, 1:22. 12 (Whereupon a break was taken.) 13 THE VIDEO TECHNICIAN: Back on 14 the record. The time is 1:27. 15 BY MR. ZEIGER: 16 Q. So, Trooper, do you have a duty to 17 report other troopers if you see that they're -- 18 they've done something wrong, like, for example, 19 steal a pack of gum? 20 A. Yes. 21 Q. And what would you do if that 22 occurred? 23 A. We report it to the supervisor. 24 Q. Is there a system called the blue box</p>
<p style="text-align: right;">Page 46</p> <p>1 A. The Marine Corps. 2 Q. Thank you for your service. Were you 3 involved in any police work or security in the -- 4 in the Marines? 5 A. No. 6 Q. In any time before you were a state 7 trooper, are you aware, either in the military or 8 in any of the law enforcement jobs you had of any 9 complaints against you for excessive force? 10 A. No. 11 Q. Okay. Now, as a state trooper, are you 12 aware of the process of when a complaint is made 13 against you for excessive force? 14 A. Yes. 15 Q. What is the process, if you know? 16 A. What is that? 17 Q. What is the procedure? 18 A. I guess any private citizen could file a 19 complaint through whatever resources there are. I 20 don't know the whole procedure for that. But in 21 our internal system of how we handle it, it's 22 handled through the Bureau of Professional 23 Responsibilities and IAD, internal investigation 24 division.</p>	<p style="text-align: right;">Page 48</p> <p>1 or blue something, Blue Team? 2 A. Yes, Blue Team, yes. 3 Q. And do you have any duty to log in and 4 file anything on that? 5 A. If the supervisory - it's a supervisory 6 thing. So the supervisor would then do the Blue 7 Team. 8 Q. Do you have any duty to self report like 9 on yourself? 10 A. Like make a Blue Team on myself? 11 Q. Like if you got a DUI? 12 A. Oh, yes. 13 Q. And what would be the procedure for 14 that? 15 A. Any type of criminal charges, even a 16 speeding ticket or a summary or anything like 17 that. 18 Q. No. I got it. What is the procedure? 19 What would you do? Like you log into the system, 20 you tell a supervisor, like what is the process? 21 A. You tell -- you tell the supervisor. 22 Q. Okay. 23 A. And he'll make that Blue Team entry. 24 Q. And what about the use of force; do you</p>

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1 have a duty to self report the use of force?	1 A. Yes.
2 A. Well, that's part of -- like you went	2 Q. And this is a listing of --
3 over the report. If I think you're going the	3 chronological listing of times where --
4 direction I think you are, when I was released	4 MR. BRADFORD: AED events if you
5 from the Topcom and command post, that's when it	5 want to kind of just give it a label.
6 was reported that she received injuries, and	6 MR. ZEIGER: I think that's fair,
7 that's when the Blue Team was done. So he -- he	7 IAD events.
8 was made aware.	8 BY MR. ZEIGER:
9 Q. So, you -- you self reported to your	9 Q. This is a listing of IAD events.
10 commanding officer in this case?	10 Okay?
11 A. I made a report that the use of force	11 A. I'm aware of them, yes.
12 was used and that she was injured. And he knew	12 Q. I'm going to scroll down to the last
13 that there's an injury had happened. So we	13 page. Do you see where it says incident type?
14 debrief it. And I report my use of force whenever	14 A. Yes.
15 there's a use of force incident, when there's an	15 Q. And then it says received. Do you see
16 injury sustained or believed to be sustained, a	16 that?
17 Blue Team entry is completed for an internal	17 A. Yes.
18 investigation.	18 Q. And below that it says complaint and the
19 Q. And can you -- can you distinguish	19 number six. Do you see that?
20 between that sort of self reporting and when a	20 A. Yes.
21 citizen complains about you using too much	21 Q. Do you know what any of those six were
22 force?	22 about or all six of those, do you know what
23 A. All I know is there's two different	23 they're about?
24 types of Blue Teams. There's a noncompliant and a	24 A. Off the top of my head, no. I know
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1 use of force with injury. I know that there's	1 there's a couple of miscellaneous property
2 two.	2 complaints and stuff like that.
3 Q. Okay. And, so, do you know in your	3 Q. Okay. None of them involved force, as
4 career as a state trooper has there ever been a	4 far as you know?
5 citizen's complaint about you using too much	5 A. Off the top of my head, correct.
6 force?	6 Q. Firearm discharge, there's a one?
7 A. No.	7 A. Yes.
8 Q. And do you know as a trooper how many	8 Q. Do you know what that is about?
9 times you've self reported?	9 A. Yes.
10 A. I don't know how many but there has been	10 Q. What is it about?
11 times.	11 A. I was involved in a shooting, December
12 Q. Okay. I'm going to share another	12 of 2017.
13 document with you now. Can you see that, Trooper?	13 Q. Okay. Next it says, supervisory
14 A. Yes.	14 resolution, one. Do you know -- do you know what
15 Q. And it says concise officer history,	15 that was?
16 Corporal Clinton C. Painter. Is that you?	16 A. Yes. I believe that was -- I think that
17 A. That's me, yes.	17 was one of -- one of the first ones that were
18 Q. Have you ever seen this document	18 received.
19 before?	19 Q. Do you know what it was about?
20 A. No, not this one.	20 A. I think race or something like that.
21 Q. Okay. I'm going report to you that I	21 Q. Say again?
22 requested this in -- I requested a history for you	22 A. Something about race.
23 in a written paper discovery request and that your	23 Q. I can't understand the word. Can you
24 attorney supplied me with this document. Okay?	24 spell the word?

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1 A. Like race.	1 A. No, none.
2 Q. Can you spell it?	2 Q. Are you aware of any of the IAD
3 A. Like I profiled someone --	3 investigations or any of these 12 complaints being
4 Q. Like racial profiling?	4 in regard to you using your shield as a weapon
5 A. Yes.	5 other than in this case?
6 Q. I see. Moving on, use of force, it says	6 A. Yes.
7 12. Your testimony today is there's 12 times that	7 Q. How many?
8 you've self reported the type of force that you	8 A. I don't know. Six, that's a guess.
9 used?	9 Q. I'm going to ask your attorney to
10 MR. BRADFORD: Objection to form.	10 provide me in discovery investigation files for
11 BY MR. ZEIGER:	11 those six times.
12 Q. If you understand you can answer, if not	12 A. Okay.
13 I'm happy to rephrase it.	13 Q. Sorry.
14 A. That's what it says.	14 A. I don't know if it's six. That was a
15 Q. Okay. I'm going to ask another question	15 guess. But if they're there, if you need them.
16 then. Do you agree it says on here use of force,	16 MR. BRADFORD: How about this,
17 12, correct?	17 Brian, whichever ones involve the use of a shield,
18 A. Yes.	18 whatever that number is.
19 Q. I asked you previously if you're aware	19 MR. ZEIGER: That's fair.
20 that any civilian has ever complained about you	20 MR. BRADFORD: I'll see what is
21 for use of force and your answer was never, none;	21 available and see how hard that is to search for
22 is that correct?	22 and we'll come up with some sort of solution to
23 A. That I was made aware of.	23 that.
24 Q. I see. And I asked you also previously	24 MR. ZEIGER: I agree.
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1 if you self reported about using force on other	1 BY MR. ZEIGER:
2 times other than this case and you said yes. Do	2 Q. Trooper, do you know on any of these 12,
3 you remember that?	3 were any of them founded against you?
4 A. Yes.	4 A. No.
5 Q. And I asked you how many and you said I	5 Q. Have you ever been sued before?
6 think you used the word several. Do you remember	6 A. I believe -- I don't know the answer to
7 that?	7 that question. I've received litigation holds for
8 A. Yes.	8 things that I was involved in but not directly.
9 Q. Okay. This says 12. So, does 12 seem	9 But the best of my knowledge, no, nothing like
10 like the amount of times you would have self	10 this.
11 reported?	11 MR. BRADFORD: Well, litigation
12 A. I believe so.	12 hold doesn't mean you're necessarily being sued.
13 Q. Because you're not aware of any use of	13 It just means you might have information that
14 force complaints against you by civilians,	14 might be relevant to the lawsuit.
15 correct?	15 THE WITNESS: Okay. Well, no
16 A. Correct. I had --	16 then.
17 Q. Please finish your answer.	17 BY MR. ZEIGER:
18 A. I'm sorry. I've had the interviews, but	18 Q. Do you know what a litigation hold meant
19 I -- I don't know if it was regarding a complaint	19 to you before your lawyer just made that
20 or self report or both. A lot of times I don't	20 statement?
21 know how I got them. But, yes, I've had IAD	21 A. No, because different cases and
22 interviews with -- regarding the use of force.	22 different instances I get them in email and I
23 Q. Are you aware of any of the IAD	23 comply with them the best I can with what I have
24 interviews being founded against?	24 to offer. Other than that, no.

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1 Q. They ask you questions in an email or 2 ask you for documents?	1 It's heavy enough as it is. How am I going to 2 lift somebody up with it.
3 A. No, just advising that there's a 4 litigation and to -- to keep your documents.	3 Q. Well, how tall are you?
5 Q. And have you had any training regarding 6 the shield?	4 A. I'm 5, 7.
7 A. Yes.	5 Q. How much do you weigh?
8 Q. Can you describe that training?	6 A. 190 pounds.
9 A. It was through our special emergency 10 response team, CPB portion, covert and through our 11 basic class --	7 Q. So, if there was a wall there and you 8 hit -- and you pinned someone to the wall with a 9 shield, would you be able to sort of lean down and 10 into them and then lift up with the shield to get 11 their feet off the ground; is that a 12 possibility?
12 Q. Does any involve using the training -- 13 using the shield as an object of force?	13 A. I don't believe so.
14 A. Yes.	14 Q. Have you ever done that before?
15 Q. And which training is that?	15 A. No.
16 A. It was through the training.	16 Q. And you didn't do that to Ada Anglemeyer 17 in this case; did you?
17 Q. I'm sorry. I thought you just mentioned 18 three separate trainings for the shield. Which of 19 the three --	18 A. No.
20 A. Our special emergency response team CPB 21 course.	19 Q. And in this case when your shield made 20 contact with Ada Anglemeyer, did she hit any 21 walls?
22 Q. Is it your testimony today that you're 23 authorized to use the shield as a weapon?	22 A. No.
24 MR. BRADFORD: Objection to form.	23 Q. She just fell straight down?
24 MR. BRADFORD: Objection to form.	24 A. Yeah, backwards.
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1 THE WITNESS: Not as a weapon. 2 BY MR. ZEIGER: 3 Q. Okay. Is it your testimony today you're 4 authorized to use the shield as an object of 5 force?	1 Q. Understood. I'm going to share this 2 document now. Then I'm going to share another 3 document. Can you see that?
6 A. Yes.	4 A. Yes. I'm going to scroll down.
7 Q. And can you describe briefly what you're 8 allowed to do with the shield as it relates to 9 force?	5 Q. So, the previous document that I used, 6 that was your concise history. I'd like to have 7 that marked as Painter 2. And this document, I'd 8 like to have marked as Painter 3. I'm starting on 9 a page that has been previously Bates stamped by 10 your attorney as PSP 64. Okay. I'm saying that 11 just for the court reporter.
10 A. To push and to pin people with it.	12 So, on PSP 64 that is here with us --
11 Q. Are you allowed to lift people up with 12 it?	13 pardon me for one second. This is your name, 14 correct?
13 A. I don't know how you would do that.	15 A. Yes.
14 Q. Nor I.	16 Q. And this is the date of the report, 17 correct?
15 A. What do you mean?	18 A. Yes.
16 Q. Are you -- are you able to push someone 17 into a wall with it and then lift them up with 18 their feet off the ground with the shield --	19 Q. Okay. You participated in this 20 investigation?
19 A. No. I don't know what you're asking. 20 Can I lift somebody with a shield --	21 A. Yes.
21 Q. I don't want to interrupt you at all.	22 Q. Was there anyone present at the time 23 when you were interviewed during this 24 investigation that was not a member of the

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<p>1 Pennsylvania State Police?</p> <p>2 A. I'm trying to think back, not that I</p> <p>3 know of.</p> <p>4 Q. Is there any kind of independent</p> <p>5 organization or civilian who had anything to do</p> <p>6 with any kind of -- this investigation?</p> <p>7 A. No.</p> <p>8 Q. And in -- in this investigation, did you</p> <p>9 have an opportunity to review this report before</p> <p>10 your deposition today?</p> <p>11 A. No, I've never seen this.</p> <p>12 Q. Okay. And were you ever give this to</p> <p>13 read at any time after the investigation took</p> <p>14 place?</p> <p>15 A. I never seen this.</p> <p>16 Q. No problem. I'm going to scroll through</p> <p>17 this document, okay, and stop on various different</p> <p>18 pages. Okay. I'm here now on what has been</p> <p>19 previously marked as PSP 83. This says page 20 of</p> <p>20 31 and it says transcript. Are you aware that</p> <p>21 your interview was being recorded?</p> <p>22 A. Yes.</p> <p>23 Q. And have you seen the transcript before?</p> <p>24 A. Yes.</p>	<p>1 part of the SERT team and you went in, was any of</p> <p>2 that videoed, to your knowledge?</p> <p>3 A. No.</p> <p>4 Q. Did -- did you have a body cam on?</p> <p>5 A. No.</p> <p>6 Q. I'm only looking for an answer from you,</p> <p>7 Corporal Painter. Do you know why you don't have</p> <p>8 a video -- a body cam on?</p> <p>9 A. Do I know why I don't?</p> <p>10 Q. That's the question, correct.</p> <p>11 A. No, I don't.</p> <p>12 Q. Have you ever requested to any</p> <p>13 supervisor that you would like to have a body cam</p> <p>14 on?</p> <p>15 A. No.</p> <p>16 Q. Have you ever written a note or an email</p> <p>17 or a text message to any supervisor to say I would</p> <p>18 like a body cam?</p> <p>19 A. No.</p> <p>20 Q. I'm going to unshare this document.</p> <p>21 As far as you know, in this operation was anything</p> <p>22 recovered related to any kind of methamphetamine</p> <p>23 operation?</p> <p>24 A. I don't know nothing about the</p>
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<p>1 Q. And did you review this transcript</p> <p>2 before your deposition today?</p> <p>3 A. Yes.</p> <p>4 Q. And did you tell anybody that there were</p> <p>5 any mistakes or omissions in the transcript?</p> <p>6 A. No.</p> <p>7 Q. Do you suspect that whomever typed this</p> <p>8 up missed anything?</p> <p>9 A. No.</p> <p>10 Q. I'm going to keep scrolling. Is it your</p> <p>11 understanding that this transcript is complete,</p> <p>12 meaning nothing is missing from it, it went from</p> <p>13 beginning to end of your interview; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. And the people that interviewed you,</p> <p>16 they all worked for the Pennsylvania State Police,</p> <p>17 correct?</p> <p>18 A. Yes.</p> <p>19 Q. There's no independent body or agency or</p> <p>20 civilians that were part of the interview process,</p> <p>21 correct?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. Now, during the incident when the</p> <p>24 SERT team went into the -- the home and you were</p>	<p>1 investigation and what it -- what it revealed.</p> <p>2 Q. But, again, my questions are like with</p> <p>3 your own eyes, right. So, like when you're there,</p> <p>4 do you see anything related to any kind of</p> <p>5 methamphetamine operation at all during the entire</p> <p>6 time you were at the property?</p> <p>7 A. No.</p> <p>8 Q. And other than Mark Anglemeyer, did you</p> <p>9 observe anyone else being arrested?</p> <p>10 A. No.</p> <p>11 MR. BRADFORD: Object to form.</p> <p>12 BY MR. ZEIGER:</p> <p>13 Q. Okay. And other than Mark Anglemeyer,</p> <p>14 did you personally observe anyone else commit any</p> <p>15 crimes against the Commonwealth of Pennsylvania?</p> <p>16 A. No.</p> <p>17 Q. Okay. Are you aware from your briefing</p> <p>18 that there's any information that there was any</p> <p>19 methamphetamine operation going on in any building</p> <p>20 other than the building called the garage?</p> <p>21 A. Not to my knowledge.</p> <p>22 Q. Okay. The gentleman who was in the room</p> <p>23 that -- that sort of walked away from you when you</p> <p>24 first entered the property -- just go all the way</p>

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<p style="text-align: right;">Page 65</p> <p>1 back to the beginning of the story, okay. You 2 enter the property. There's a gentleman that goes 3 from that room to the adjoining room when he sees 4 you guys. Do you remember that? 5 A. Yes. 6 Q. Did you ever learn that gentleman's 7 name? 8 A. I believe I -- I don't know his name but 9 it was the older gentleman, correct? 10 Q. I'm asking you. 11 A. I don't know his name, no. 12 Q. Did he look like a senior citizen to 13 you? 14 A. No. But he was an older gentleman. 15 I -- I saw him for a split second. We made eye 16 contact and he was older, but I can't tell you -- 17 this is what -- what I'm trying to explain to you 18 earlier of the speed and the progressions of this, 19 I -- I don't -- I don't know. 20 Q. Okay. Was there any African American 21 troopers that were part of the SERT team that 22 entered the house that day, if you recall? 23 A. I don't know what his assignment was but 24 that there are.</p>	<p style="text-align: right;">Page 67</p> <p>1 A. Not that I recall. 2 Q. And did you hear Corporal King instruct 3 any other troopers, give them any commands or 4 anything like that on that day? 5 A. Not that I recall. 6 Q. And physically would you describe 7 Corporal King as a very large man? 8 A. Yes. 9 Q. All right. I have one more group of 10 questions. So, other than the allegation of the 11 methamphetamine operation when you were debriefed, 12 you were not aware of any other allegations of any 13 other crimes, correct? 14 A. Debriefed when? 15 Q. I'm sorry. The -- the briefing, like at 16 4:00 a.m. other than the methamphetamine 17 operation, no one told you about any other 18 suspected crimes, correct? 19 A. Yeah, to my knowledge, yes. 20 Q. Okay. And when you entered the home, no 21 one pointed a gun or a weapon at you or anything 22 of that nature? 23 A. Correct. 24 Q. Correct, meaning no one did that to</p>
<p style="text-align: right;">Page 66</p> <p>1 Q. Was there one or more than one? Let's 2 start there. 3 A. In the house? 4 Q. Yes. 5 A. I don't know what his assignment was. 6 Q. Okay. 7 A. But there are African American -- 8 Q. I know that but -- 9 A. -- SERT members. 10 Q. When you guys left the briefing area and 11 you traveled to the house, do you know how many 12 African American troopers there were involved in 13 the entire party that day? 14 A. No, I don't. 15 Q. Okay. If I said that there was a 16 trooper named Brian King that was part of the SERT 17 team that entered the house, would that refresh 18 your recollection? 19 A. Well, I know he's on the team, but I 20 don't know if he's part of the entry team or not. 21 I don't know what his assignment was. 22 Q. Did you have any interaction with 23 Corporal Brian King inside the property on that 24 day?</p>	<p style="text-align: right;">Page 68</p> <p>1 you? 2 A. No one did that to me. 3 Q. And when you were dealing with Ada 4 Anglemeyer, she was not actively resisting; was 5 she? 6 A. Not actively, correct. 7 Q. Right, because she wasn't under arrest 8 for anything, so you can't resist an arrest if 9 there's no underlying arrest, correct? 10 MR. BRADFORD: Objection to form. 11 THE WITNESS: She was passively 12 resistant. 13 BY MR. ZEIGER: 14 Q. I understand that. I totally get that, 15 Trooper. But what I mean is she wasn't a suspect 16 for like disorderly conduct or something and was 17 like resisting being arrested for some other 18 charge, right? 19 A. Right. 20 Q. Okay. Her passive resistance was in 21 regard to your execution of the warrant, right? 22 A. Yes. 23 Q. I'm asking a totally different question. 24 In other words, you weren't saying to her, Ada,</p>

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<p>1 you're under arrest for X and then she started 2 resisting being arrested for that, right? 3 A. Right. 4 Q. She didn't try to run away from you; did 5 she? 6 A. No. 7 Q. She didn't try to escape the house, 8 correct? 9 A. Correct. 10 Q. Okay. You had no knowledge before you 11 went in the house that a woman named Ada 12 Anglemeyer was violent or dangerous; did you? 13 A. I did have knowledge of that. 14 Q. That Ada Anglemeyer was violent or 15 dangerous? 16 A. Yes. During the briefing it was briefed 17 that she was -- one of the township police had 18 been there and she open carries through the house, 19 she's verbally aggressive towards -- towards them 20 to a point where they don't even go. That was 21 within the briefing. 22 Q. They -- they don't even go for what? I 23 didn't understand. Can you explain? 24 A. It's in the video of -- during the intel</p>	<p>1 Q. And what was the next thing you said, 2 she was anti police or she would say something 3 anti police, what was the next thing you said? 4 A. I guess -- I guess during the briefing 5 that she was -- she was verbally aggressive. 6 Q. Right. It's not verbally -- it's not 7 illegal to be verbally aggressive towards police 8 in the United States, correct? 9 A. Correct. 10 Q. But as long as a citizen doesn't 11 threaten you personally, they can basically say 12 whatever they want to you other than a threat to 13 you, correct? 14 MR. BRADFORD: Objection to form. 15 THE WITNESS: Correct. 16 BY MR. ZEIGER: 17 Q. Okay. If you have another answer or 18 something -- your lawyer objected. Do you 19 understand the question I asked you? 20 MR. BRADFORD: He answered it. 21 It's fine. 22 MR. ZEIGER: I'll move on. 23 MR. BRADFORD: It's on the 24 record.</p>
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<p>1 report that past experiences with then, Ada has 2 been seen to open carry throughout the house and 3 is verbally anti -- anti police, aggressive 4 towards them. 5 Q. And then -- and then you said and they 6 won't even go, that's what you said? 7 A. Yes, that at -- at times -- it was 8 passed to me at times that they -- like they don't 9 have a solo officer responding at that house due 10 to, I guess, the -- I don't know what the word 11 they say -- to put it as, but whatever township or 12 police department is out there, they don't go to 13 that residence due to how unruly these people 14 are. 15 Q. I'm -- so, if someone called and said we 16 have a domestic, they just wouldn't show up? 17 A. No. They'll get multiple officers. 18 Q. I see. And -- 19 A. A solo or single officer response, they 20 don't do. 21 Q. Open carrying of a firearm on your 22 person is not illegal in the United States 23 anywhere; is it? 24 A. No.</p>	<p>1 BY MR. ZEIGER: 2 Q. And when you entered the house, she and 3 the other two persons were the only people that 4 you encountered? 5 A. Well, there's that one other guy that 6 briefly -- that was briefly there. 7 Q. So three total? 8 A. Uh-huh. 9 Q. Yes? 10 A. Yes. 11 Q. And at the time that you were dealing 12 with her with your shield, she was the only 13 civilian in your surrounding, correct? 14 A. Correct. 15 Q. She was not arrested or charged with 16 anything, correct? 17 A. Correct. 18 Q. Okay. And just so we're clear, whatever 19 this injury is to her back or reinjury to her 20 back, you do accept responsibility for causing 21 that incident? 22 MR. BRADFORD: Objection to form. 23 Her alleged injury or -- I'm just objecting to 24 form. Go ahead.</p>

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1 BY MR. ZEIGER:	1 A. Yes.
2 Q. You can answer.	2 Q. Did you know if anyone was in that room
3 A. Can you repeat the question, please?	3 behind her?
4 Q. If she was injured as a result of this	4 A. I did not know.
5 or reinjured her back, an injury to her back as a	5 Q. Did you know if anyone in that room --
6 result of your interaction with her that day, you	6 there was someone in that room who was armed?
7 accept responsibility for that injury?	7 A. I did not know.
8 MR. BRADFORD: Objection to form.	8 Q. Were you -- were you made aware
9 THE WITNESS: Yes.	9 beforehand during the briefing that there were
10 MR. ZEIGER: I have nothing	10 firearms all over the house?
11 further.	11 A. Yes.
12 BY MR. BRADFORD:	12 Q. And there was at least one, maybe more
13 Q. I have a few questions. You said you --	13 people who had criminal records in that house?
14 Trooper Painter, you said you encountered three	14 A. Yes.
15 people when you entered the house?	15 Q. And could someone who doesn't actually
16 A. Yes.	16 own a firearm pick up a firearm and use it?
17 Q. At least you personally. What was the	17 A. Yes.
18 level of cooperation that you received from these	18 Q. You're aware that the briefing or at
19 individuals?	19 least the majority of it was videotaped?
20 A. There was no -- no cooperation	20 A. The briefing, yes.
21 whatsoever.	21 Q. Yes, at 04:00 hours?
22 Q. Was this -- was this unusual to you in	22 A. Yes.
23 your experience?	23 Q. And those videos have been provided to
24 A. Yes.	24 plaintiff's counsel. Were you present for that --
Page 74	Page 76
1 Q. Is it concerning to you?	1 all of those -- have you seen those videos?
2 A. It is concerning.	2 A. I saw them and I was present during
3 Q. Do you know why they were not	3 them, yes.
4 cooperating?	4 Q. Okay. That was my question. So, is it
5 MR. ZEIGER: Objection. Calls	5 fair that's the best record of what was actually
6 for speculation. You can answer.	6 presented to you by SERT leadership?
7 THE WITNESS: I mean, I have -- I	7 A. Yes.
8 have no idea why they were acting that way.	8 Q. Did you decide what information was
9 BY MR. BRADFORD:	9 presented to you?
10 Q. Did you know these individuals, any of	10 A. I'm sorry?
11 these three individuals that you encountered to be	11 Q. Hold on one second.
12 unarmed, such as not having, you know, like a gun	12 (Discussion off the record.)
13 in their pocket or in -- behind their back or	13 (Jason Pelotte is now present.)
14 tucked in their waistband?	14 BY MR. BRADFORD:
15 A. Did I know that?	15 Q. So I think I asked you, did you control
16 Q. Did you know of them to be unarmed?	16 what information was presented to you during that
17 A. No.	17 briefing?
18 Q. Did you know the layout of the house	18 A. No.
19 when you were -- before you entered it?	19 Q. Did you assume that if it was being
20 A. No.	20 presented to you that it was important and
21 Q. When you encountered Ada Anglemeyer,	21 relevant?
22 who -- who you later determined to be Ada	22 A. Yes.
23 Anglemeyer, was there a room behind her that she	23 Q. Were you given an intelligence brief, a
24 was blocking access to?	24 document?

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<p>1 A. Yes.</p> <p>2 Q. I'm going to share my screen we. Can</p> <p>3 get this marked as -- what are we up to, Brian?</p> <p>4 MR. ZEIGER: I think No. 4 would</p> <p>5 be the next one.</p> <p>6 MR. BRADFORD: No, 4, so this will</p> <p>7 be Painter 4.</p> <p>8 BY MR. BRADFORD:</p> <p>9 Q. Is that up on your screen?</p> <p>10 A. Yes, it is.</p> <p>11 Q. You can see that. Okay. And it's an 11</p> <p>12 page document. So I'm not going to show you the</p> <p>13 whole thing here. But does this appear to be the</p> <p>14 intelligence brief from -- from the day in</p> <p>15 question?</p> <p>16 A. Yes, it does.</p> <p>17 Q. February 23, 2018 search warrant service</p> <p>18 at 340 Old Allentown Road, Bushkill Township</p> <p>19 Northampton County, right?</p> <p>20 A. Correct.</p> <p>21 Q. And included in here -- I'm going to</p> <p>22 read from the first page at 0322 on the Bates</p> <p>23 stamp. CI related that there are rifles all over</p> <p>24 the house. Then local PD reported that rifle was</p>	<p>1 conduct. In 2009 he got into an argument with a</p> <p>2 district judge during a prelim. He ran out of the</p> <p>3 court and drove off with the police chasing him.</p> <p>4 When Anglemeyer stopped at a stop sign, the</p> <p>5 officers got out of their car and reached into his</p> <p>6 truck to get him to stop. Anglemeyer hit the gas</p> <p>7 nearly pinning one officer between the two cars.</p> <p>8 He fled to his residence and was taken into</p> <p>9 custody. Was that -- was that information that</p> <p>10 was shared with you during the briefing?</p> <p>11 A. It was.</p> <p>12 Q. And I'm reading from, just for the</p> <p>13 record, Bates 0323, the second page. And we'll</p> <p>14 move on to Jeffrey Anglemeyer, who is a plaintiff</p> <p>15 in this lawsuit. We'll move onto, it's the third</p> <p>16 page, Bates stamped 324. It says, according to</p> <p>17 investigators, Jeffrey has been staying at this</p> <p>18 residence since recently being -- being bailed out</p> <p>19 of jail on domestic abuse charge. Jeffrey's</p> <p>20 criminal history is out of PA, New Jersey and</p> <p>21 Florida, consists of firearms not to be carried,</p> <p>22 theft, criminal mischief, obstructing justice,</p> <p>23 numerous drug possession, PWI, simple assault,</p> <p>24 harassment, disorderly conduct, terroristic</p>
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<p>1 observed behind the front door when they were at</p> <p>2 the home for a call a few years ago. That</p> <p>3 information -- you had that information -- first</p> <p>4 of all, did I read that correctly?</p> <p>5 A. Yes, you did.</p> <p>6 Q. So you had that information available?</p> <p>7 A. Yes.</p> <p>8 Q. And you're aware that Mark Anglemeyer</p> <p>9 had several -- had a pretty extensive criminal</p> <p>10 history?</p> <p>11 A. Yes.</p> <p>12 Q. And he lived in -- it was your</p> <p>13 understanding that he was in that house?</p> <p>14 A. Yes.</p> <p>15 Q. And you didn't know exactly what part of</p> <p>16 the house he was in?</p> <p>17 A. No, I did not.</p> <p>18 Q. You didn't even know the layout of the</p> <p>19 house?</p> <p>20 A. Correct.</p> <p>21 Q. And he has a criminal history of drug</p> <p>22 possession, DWI charges, recklessly endangering,</p> <p>23 simple assault, escape, fleeing, alluding,</p> <p>24 resisting arrest, harassment and disorderly</p>	<p>1 threats, strangulation and resisting arrest. Was</p> <p>2 that information you were aware of before you</p> <p>3 entered the residence that day?</p> <p>4 A. It was.</p> <p>5 Q. And a gun query was completed for</p> <p>6 Jeffrey, which indicated that he purchased a 22</p> <p>7 caliber Smith and Wesson handgun and a 357 Smith</p> <p>8 and Wesson handgun, both in 1985. He does not</p> <p>9 have a permit to carry. You were aware of that --</p> <p>10 that information?</p> <p>11 A. I was.</p> <p>12 Q. And it says for Ada, that she is a</p> <p>13 coowner of the residence and it is unknown if Ada</p> <p>14 has a part in the drug sales. Did you -- did you</p> <p>15 have that information?</p> <p>16 A. Yes, I did.</p> <p>17 Q. And it indicates that she purchased a 25</p> <p>18 caliber handgun in 1979. She does have an active</p> <p>19 concealed carry permit in Northampton County. You</p> <p>20 had that information?</p> <p>21 A. I did.</p> <p>22 Q. And going back to Richard Anglemeyer.</p> <p>23 It indicates, it is not known if Richard has a</p> <p>24 part in the drug sales. Is that information you</p>

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1 had?	1 day?
2 A. Yes.	2 A. Yes.
3 Q. And it indicated that that information	3 Q. You were asked earlier by counsel if
4 also included that he purchased a 9 millimeter	4 Mark Anglemeyer was the only person considered
5 Glock handgun in 1989. He does not possess a	5 dangerous to you. Do you remember being asked
6 permit to carry. Is that information you had?	6 that?
7 A. Yes.	7 A. Yes.
8 Q. And onto page six of this document,	8 Q. Do you want to stand by that answer or
9 Bates 0327. This is information related to Renee	9 do you want to revise that at all based on that
10 Kluska. It says Renee's criminal history consists	10 information I just, you know, refreshed your
11 of a 1996 simple assault arrest in Pennsylvania	11 recollection with?
12 and it indicates that she has an active conceal	12 A. Yes, based on -- on the briefing he was
13 carry permit in Northampton County. Is that	13 not.
14 information you had?	14 Q. Is it fair to say that all of these
15 A. Yes.	15 people were a concern given that -- given that the
16 Q. And it also says it is not known if she	16 information you had regarding their criminal
17 has a part in the drug sales, correct?	17 histories and the guns, whether they were there
18 A. Correct.	18 legally or not?
19 Q. Moving on to the seventh page of this	19 A. Yes.
20 document, page 3 -- 0328 on the Bates, this	20 MR. BRADFORD: I'm done. I don't
21 pertains to Joseph Kluska. It indicates it is not	21 know you if have any followup on that.
22 known if he has a part in the drug sales and that	22 MR. ZEIGER: I do.
23 he has a criminal history in Pennsylvania	23 BY MR. ZEIGER:
24 consisting of DUI, simple assault and disorderly	24 Q. So, just to be clear, you -- you went
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1 conduct. A gun query was negative. He does not	1 into the house at 6:00 a.m, right?
2 possess a concealed carry permit. Is that	2 A. Yes.
3 information you had available before you entered	3 Q. And it was February and so it was still
4 the residence that day?	4 dark outside at 6:00 a.m. when you entered the
5 A. Yes.	5 house, right?
6 Q. On page nine, which is Bates 0330.	6 A. Correct.
7 What -- what -- what is depicted on the bottom	7 Q. And you do that because you hope that
8 photograph there?	8 some people are still asleep when you go in the
9 A. Someone shooting a rifle into, it looks	9 house, right?
10 like a lake or a body of water.	10 A. I don't know the reason why they do
11 Q. And did you have -- was information	11 that.
12 presented at the briefing that there were AR15s	12 Q. What do you think the reason is?
13 in -- at this residence?	13 A. I -- I can't answer for the way -- for
14 A. Yes.	14 what time they do the warrants.
15 Q. What is depicted on -- on page 11? It's	15 Q. Okay. When you went in the house, was
16 Bates 0332? What is depicted at the top of this	16 anyone still asleep, if you know?
17 page here, the first photograph?	17 A. No, it didn't appear.
18 A. It's a large caliber rifle. It looks	18 Q. Did you later learn that there were
19 like 50 cal. It's scoped.	19 people that were still asleep when you went into
20 Q. And it indicates this is from Renee	20 the house?
21 Kluska's Facebook page?	21 A. Not on the lower level floor.
22 A. Yes.	22 Q. Did you learn anyone on any other level
23 Q. And this was, again, information you had	23 floor was still asleep when you went in the
24 at -- at the time you entered the residence that	24 house?

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1 A. I know they dealt with some people in 2 bedrooms. I don't know if they were sleeping or 3 not.	1 BY MR. ZEIGER: 2 Q. So that means when you were briefed, you 3 were not given any information that any of those 4 people were involved in drug sales, correct?
4 Q. Okay. As far as cooperation with you 5 when you entered the house to execute a warrant, 6 is there -- I mean, do you know of a requirement 7 that anyone cooperate with the police, right, in 8 our community? That's not a requirement or a law; 9 is it?	5 A. Correct. 6 Q. Okay. You did not observe any AR15s; 7 did you?
10 MR. BRADFORD: Objection to form. 11 You can answer.	8 A. No. 9 MR. ZEIGER: I have nothing 10 further. Please be safe.
12 THE WITNESS: No, it's not a 13 requirement.	11 BY MR. BRADFORD: 12 Q. Trooper, just a couple of followups. Do 13 you know if anyone was arrested that day one way 14 or another?
14 BY MR. ZEIGER:	15 A. I really don't recall.
15 Q. And -- and it's not illegal not to 16 cooperate with police; is it?	16 Q. Do you know if there was multiple 17 arrests of -- whether there was arrests of several 18 residents that day?
17 MR. BRADFORD: Objection to form. 18 THE WITNESS: No.	19 A. My involvement is -- is the security of 20 the house and people. We load up and we leave. 21 And I -- I haven't heard anything else on it. 22 So I don't know who was arrested, what was found 23 or anything.
19 BY MR. ZEIGER: 20 Q. Okay. And no one was arrested in this 21 case for anything in connection with not 22 cooperating with police; were they?	24 Q. And when you encountered these three
23 A. To the best of my knowledge. 24 Q. Okay. So, to the best of your	
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1 knowledge, no one was arrested for anything in 2 regard to not cooperating with the police in this 3 case, correct?	1 individuals that you personally encountered, did 2 you know one way or another if they were armed or 3 had access to a handgun within arm's reach?
4 A. Correct.	4 A. During the briefing from what the CI 5 said, yes, there -- close proximity access to 6 firearms.
5 Q. Okay. When you went into the house, you 6 did not encounter anyone who was armed; did you?	7 MR. BRADFORD: I have nothing 8 further.
7 A. No.	9 MR. ZEIGER: I have nothing
8 Q. You did not observe any firearms; did 9 you?	10 further, either. Please be safe, Trooper. Thank 11 you very much.
10 A. No.	12 THE VIDEO TECHNICIAN: Counsel, 13 same orders?
11 Q. On those reports that your lawyer just 12 showed you for the debriefing, there was a line he 13 kept repeating, he said not known if involved in 14 drug sales. Do you remember he read that about 15 six times?	14 MR. ZEIGER: Yes. 15 MR. BRADFORD: Yes.
16 A. Yes.	16 THE VIDEO TECHNICIAN: We are now
17 Q. That means there was no knowledge that 18 those people were involved in any drug sales, 19 correct?	17 going off the record on August 27, 2020 at 2:15 18 p.m.
20 MR. BRADFORD: Objection. You 21 can answer.	19 (Witness excused.) 20 (Deposition concluded at 2:15 21 p.m.)
22 THE WITNESS: It says not known by 23 the investigators. That's what was provided to 24 us.	22 23 24

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1 C E R T I F I C A T E

2

3 I hereby certify that the witness
4 was duly sworn by me and that the deposition is a
5 true record of the testimony given by the witness.

6

7

8

Dolores M. Horne

10 Dolores M. Horne

11 Dated: September 3, 2020

12

13

14

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